



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street, 3rd floor
New York, New York 10007*

June 25, 2021

By ECF

The Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

**APPLICATION GRANTED
SO ORDERED** *Vern Bro*
VERNON S. BRODERICK
U.S.D.J. 6/28/2021

Re: *Andres Oballe v. Decker, 21-cv-3253 (VSB) (KNF)*

Dear Judge Broderick:

This Office represents the government in this habeas action, in which the petitioner filed a motion to enforce on June 17, 2021. ECF No. 17. The government's opposition to that motion is due on June 29, 2021, and the petitioner's reply is due on July 6, 2021. ECF No. 16. I write respectfully, with the consent of petitioner's counsel, to request that the Court hold the remaining briefing on the motion to enforce in abeyance, and if acceptable to the Court, the parties will submit a joint status letter by Friday, July 9, 2021.

I make this request because I just learned that ICE released the petitioner from detention earlier this week on June 23, 2021. I am awaiting further information from ICE, but given this development, I respectfully request, with the consent of petitioner's counsel, that the Court hold the remaining briefing on the pending motion to enforce in abeyance while the parties confer on next steps. As noted, if acceptable to the Court, the parties will submit a joint status letter by July 9, 2021.

I thank the Court for its consideration of this submission.

Respectfully,

AUDREY STRAUSS
United States Attorney for the
Southern District of New York

By: /s/ Brandon M. Waterman
BRANDON M. WATERMAN
Assistant United States Attorney
86 Chambers Street, Third Floor
New York, New York 10003
Tel. (212) 637-2741

cc: Counsel of Record (by ECF)